

EXHIBIT “A”

Las Vegas Justice Court
Electronically Filed
10/29/2020 2:05 PM
Suzan Baucum
CLERK OF THE COURT

Las Vegas Justice Court
Clark County, Nevada

20C019979

Case No.
Dept. Department #: LVJC 4

LUBA GONZALEZ aka Luba Snow,
Plaintiff,
v.
EQUIFAX LLC,
Defendant.

Complaint

Luba Snow (formerly Gonzalez) sues Equifax LLC for money damages under the Fair Credit Reporting Act section 616 and 617 and says:

Jurisdictional Allegations

1. This is an action for money damages of \$7,500.00 US Dollars.
2. At all times material to this lawsuit Luba Snow lived in Clark County, Nevada.
3. At all times pertinent to this lawsuit Equifax LLC did commerce in Clark County, Nevada.
4. All acts necessary or precedent to the bringing of this lawsuit occurred or accrued in Clark County, Nevada.
5. This court has jurisdiction.

General Factual Allegations

6. On 03 September 2020 Luba sent her fourth and final written notice to Equifax before seeking litigation.
7. Luba is seeking relief because of the 10 unknown/unverified accounts still on her credit report.
8. The following ¹⁰ accounts are in violation of section 611(a)(7) & 611(5)(A) of the FCRA and 15 U.S.C. §1681:

A. COMENITY BANK/VCTRSEC	#585637513683...
B. ACCOUNT CORP OF SOUTHERN	#D1846...
C. RC WILLEY	#215511...
D. CALVALRY PORTFOLIO SERVIC	#21695782..
E. EOS CCA	#...88025...
F. JPMCB AUTO	#1170391733


Case Number: 20C019979

G. JPMCB AUTO	#1192471850..
H. PORTFOLIO RECOVERY	#681921006124..
I. CONNS	#55105...
J. SEQUIUM ASSET	#...418...

9. In accordance with the FCRA, Luba would like the preceding 10 items removed from her credit report in addition to the following 7 unknown hard inquires:


K. COAF	04 September 2020
L. FLAGSHIP CREDIT	04 September 2020
M. GLOBAL LENDING SERVICE	04 September 2020
N. CONSUMER PORTFOLIO S	04 September 2020
O. CONSUMER PORTFOLIO S	04 September 2020
P. CONN CREDIT CORP	19 July 2019
Q. COX COMM - LAS VEGAS	13 March 2019

Wherefore Luba Snow demands judgement for money damages in the amount of \$7,500.00 US Dollars against Equifax LLC together with other such and further relief as the court may deem reasonable and just under the circumstances.


Luba Snow(formerly Gonzalez)
7260 Sunny Countryside Ave
Las Vegas, NV 89179

Certificate of Service

Under penalty of perjury, I certify that a copy of the foregoing was provided by the US CERTIFIED MAIL to EQUIFAX INC. Lisa Stockard 1550 Peachtree Street, NW Atlanta, GA 30309 no later than 13 November 2020.


Luba Snow (formerly Gonzalez)
7260 Sunny Countryside Ave
Las Vegas, NV 89179

Las Vegas Justice Court
Electronically Filed
10/29/2020 2:06 PM
Suzan Baucum
CLERK OF THE COURT

Las Vegas Justice Court
Clark County, Nevada

Case No. 20C019979
Dept. Department #: LVJC 4

LUBA GONZALEZ aka Luba Snow,
Plaintiff,
v.
EQUIFAX LLC,
Defendant.

Exhibit Appendix to Equifax Complaint

A. Documents - 4 Letters from Luba to Equifax

LUBA GONZALEZ
 7260 SUNNY COUNTRYSIDE AVE
 LAS VEGAS NV 89179
 SSN: [REDACTED]
 DOB: [REDACTED]

EQUIFAX
 PO BOX 105518
 ATLANTA GA 30348

4/6/2020

This letter is my formal written request for you to investigate the following unverified accounts listed below: According to the Fair Credit Reporting Act, 15 U.S.C. 1681 your company is required by law to verify - through the physical verification of the signed consumer contract - any and all accounts you post on a credit report to assure maximum accuracy. Without proper verification by your company, anyone paying for reporting services could fax, mail, or e-mail in a fraudulent account.

I demand to see a copy of the Verifiable Proof, an original consumer contract with my signature on it, that you used to verify that the account belonged to the credit report named: LUBA GONZALEZ. Your failure to properly verify these accounts has hurt my ability to obtain credit for my business. Under the FCRA 15 U.S.C. 1681, unverified accounts must be promptly deleted. If you are unable to provide me with a copy of the verifiable proof that you have on file within 30(thirty) days for each account listed below then you must remove these accounts from the credit report. Please provide me with a copy of an updated and corrected credit report showing these items removed.

I demand the following accounts be verified or removed immediately

*Please also remove all non-account holding inquiries over thirty(30) days old.

Account Name	Account Number	Provide Physical Proof of Verification
- Richland Holdings	D18465601	Unverified account
- SYNCB/HOME DESIGN	603461008106	Unverified account
- Conn Credit Corp	55105...	Unverified account
- TD BANK/TARGET	585975210377	Unverified account
- SYNCB/TOYS R US	604586100848	Unverified account
- Portfolio Recovery ASS.	YNCH-1921066124	Unverified account
- JPMCB Auto	1137...	Unverified account

(continued)

Accounts Name	Account Number	Provide Physical Proof of Verification
- BC Willey	215511	Unverified account
- Portfolio Recovery	SYNCH-4585103703	unverified account
- SYNCH/TXCO	604585103703	Unverified account
- SEQUIM ASSET	7778	Unverified
- CALVARY PORTFOLIO	888	unverified
- JPMCB AUTO	1170391733	unverified
- JPMCB AUTO	1172471850	unverified

Thank You


LUBA GONZALEZ

10/28/2020

USPS.com® - USPS Tracking® Results

USPS Tracking®

FAQs

Track Another Package +**Tracking Number:** 70190140000067272611

Remove >

Your item was delivered at 9:19 am on April 13, 2020 in ATLANTA, GA 30348

✓ Delivered

April 13, 2020 at 9:19 am

Delivered

ATLANTA, GA 30348

Get Updates ✓

U.S. POSTAL SERVICE
CERTIFIED MAIL RECEIPT
 Domestic Mail Only

For delivery information, visit usps.com/track

Certified Mail Fee
 \$

Extra Services & Fees (check box and fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postage
 \$

Total Postage and Fees
 \$

Postmark
 Here

Sent to Equifax

Street address, P.O. box or PO Box No.
801501 146256

City, State, ZIP+4®
Atlanta GA 30374

Recipient's signature (if not by addressee)

Can't find

Go to our FAQs section to find answers to your tracking questions.

FAQs

LUBA GONZALEZ
7260 SUNNY COUNTRYSIDE AVE
LAS VEGAS NV 89179

EQUIFAX
PO BOX ~~185409~~ 740256
ATLANTA GA 30374

RE: Second Written Request
06.05.2020

Please be advised that this is my second written request for you to remove the unverified accounts listed below that remain on my credit report in violation of 15 USC statute 1681. You are required under the FCRA to have properly verified that an account listed on my credit report is mine by having a copy of the original credit application on file. In the results of your first re-investigation, you stated in writing that you verified that these items are being reported correctly. Who in your company verified these accounts? How did they verify them? Please provide me with the name of the individual, business address, and telephone number of the person or business contacted during your re-investigation. Also, tell me why you didn't send me copies of the verification like I asked you to?

As I am sure that you are well aware, current case law states that, Consumer Reporting Agencies bear grave responsibilities to ensure the accuracy of the accounts they report on and their responsibility must consist of something more than merely parroting information received from other sources. The courts have ordered that a re-investigation that merely shifts the burden back to the consumer and the credit grantor cannot fulfill the obligations imposed by statute 1681 a 4.

You have not provided me a copy of any original documentation that you have on file that is required under section 609 and 611 a 1 A, a consumer contract with my name on it, and under section 611 5 a of the FCRA - you are required to promptly delete all information which cannot be verified.

The law is very clear as to the civil liability and the remedy available to me negligent non-compliance, section 617, if you fail to comply with this federal law. I am a litigious consumer and fully intend on pursuing litigation in the matter to enforce my rights under the FCRA. I demand the following accounts be verified or deleted immediately.

<u>Name of account</u>	<u>Account number</u>	<u>Provide physical proof of verification</u>
RICHLAND HOLDINGS	D18465611	unverified
SYNCR/HOMEDSIGN	60346100806	unverified
COMM CREDIT CORP	55105	unverified
TD BANK TARGET	585975210377	unverified

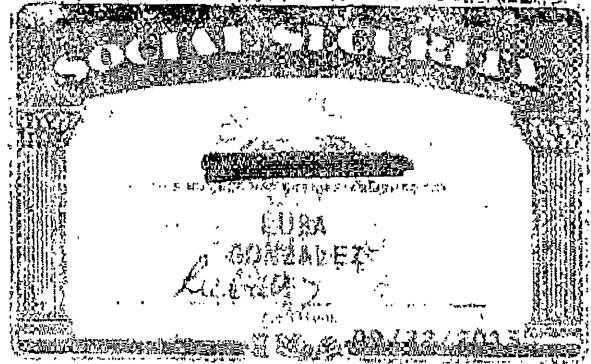
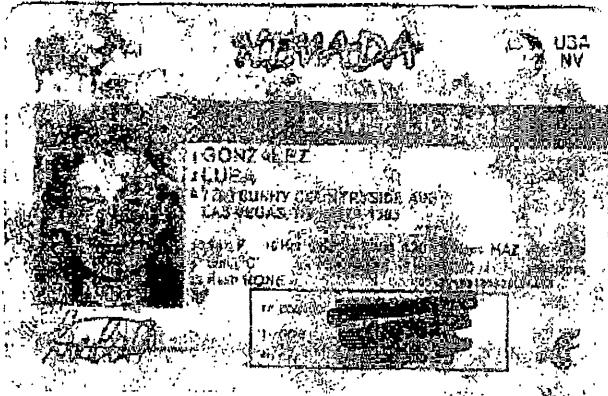
Name of account	Account number	Provide physical proof of verification
SYNCB/TOYSRUS	604586/00848	unverified
Portfolio Recovery Assoc.	synch-192/006124	unverified
JPMCB AUTO	1137...	unverified
RC WILLY	215511	unverified
PORTFOLIO RECOVERY	synch 4585/03703..	unverified
SYNCB/PSXCO	604585/03703	unverified
- SEQUIM ASSET	... 418...	unverified
- CALVARY PORTFOLIO	... 695...	unverified
- JPMCB AUTO	1170391732	unverified
- JPMCB AUTO	1192471850	unverified

~~XXXXXXXXXX~~
~~XXXXXXXXXXXXXXXXXXXX~~

Noted

Thank you

LUBA GONZALEZ



10/28/2020

USPS.com® - USPS Tracking® Results

USPS Tracking®

FAQs

Track Another Package +**Tracking Number:** 70192280000189732872

Remove ›

Your item was delivered at 1:05 pm on June 9, 2020 in ATLANTA, GA 30348.

✓ Delivered

June 9, 2020 at 1:05 pm

Delivered

ATLANTA, GA 30348

Get Updates ▼**Can't find w**

Go to our FAQs section to find answers to your tracking questions.

FAQs

7019 2280 0001 8973 2872

U.S. Postal Service
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information and updates, visit www.usps.com

Certified Mail Fee

Extra Services & Fees (unless otherwise indicated)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Restricted Mail (Certified Delivery)	\$
Postage	
Total Postage and Fees	\$

Sent to **XXXXXX**

Street or PO Box No. **XXXXXX**

City or Town **ATLANTA** State **GA** ZIP+4® **30377-9**

Postmark **ATLANTA GA 9 JUN 2020**

Postage paid by **XXXXXX**

LUBA GONZALEZ
7260 SUNNY COUNTRYSIDE AVE
LAS VEGAS NV 89179

EXPERIAN
PO BOX 9701
ALLEN TX 75013

Certified Mail: 7019 2280 0001 8973 0922
Re: Third Written Request

Please be advised that this is my third written request and final warning that I fully intend to pursue litigation in accordance with the FCRA to enforce my rights and seek relief and recover all monetary damages that I may be entitled to under section 616 and section 617 regarding your continued willful and negligent non compliance.

Despite two written requests, the unverified items listed below still remain on the credit file named LUBA GONZALEZ, in violation of federal law. You are required under the FCRA to have properly verified that an account listed on a credit file belongs to that particular credit file by having a copy of the original credit application on file. In the results of your first investigation and subsequent re-investigation, you stated in writing that you verified that these accounts are being reported correctly. Who in your company verified these accounts belong to the account named LUBA GONZALEZ? How did you verify them? You still have not provided me with the name of the individual, business address and telephone number of the person or business contacted during your re-investigation. You have not provided me with a copy of any documentation, (a credit application with my signature on it) as required under section 609 & section 611(a)(1)(A). Furthermore, you have failed to provide me the method of verification as required under section 609 and section 611(a)(7). Please be advised that under section 611(5)(A) of the FCRA - you are required to promptly delete all information which cannot be verified.

The law is very clear as to the civil liability and the remedy available to me (section 616 & 617) if you fail to comply with federal law. I am a litigious consumer and fully intend on pursuing litigation in this matter to enforce my rights under the FCRA.

I demand that you send me copies of the documents you used to verify the following accounts listed below or you delete them immediately. Please provide me with a copy of an updated and corrected credit report showing that these items have been deleted.

<u>Name of Account</u>	<u>Account Number</u>	<u>Provide physical proof of verification</u>
SEAVIUM ASSET SOLUTIONS	332.7283.7...	unverified
ALLCORP OF SOUTHEAST NEVADA	D184656 N1	unverified
PH EAA/ABS/CONTRACT	4216527880940..	unverified
ADS COMENIT7/VICTORIA	585637513663...	unverified

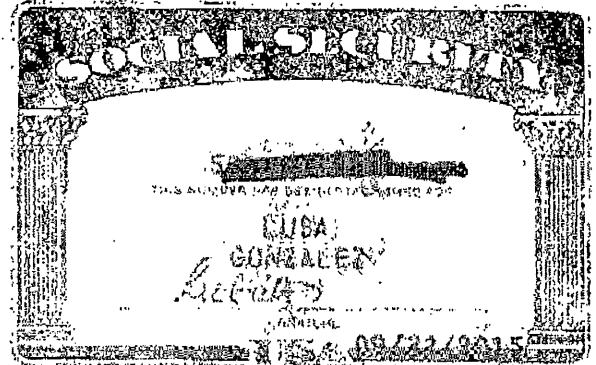
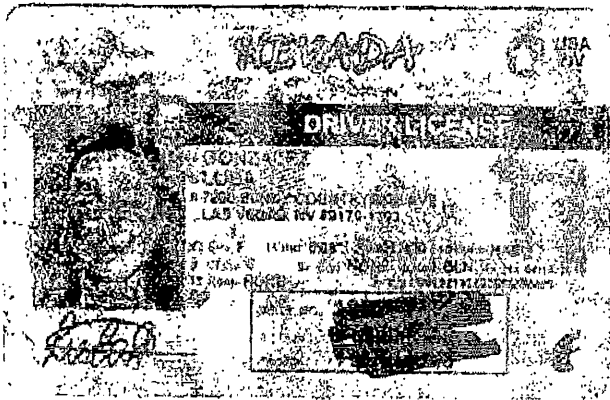
<u>Name of Account</u>	<u>Account Number</u>	<u>Provide physical proof of verification</u>
JPMCB AUTO	1170391733...	unverified
JPMCB AUTO	1192471850...	unverified
JPMCB AUTO	1137...	unverified
PORTFOLIO RECOVERY	601421006129...	unverified
PORTFOLIO RECOVERY	604585103203...	unverified
RCWILLEY HOME	215511...	unverified
TD BANK USATARGENT	585975210377...	unverified
WF CRD SVC	446542059002...	unverified
FRAMEGEN	577442114091	unverified
CARITA ONE	51780557332	unverified

~~DOB 11-04-80~~
~~SSN 51780557332~~

Thank you

Luba Gonzalez

LUBA GONZALEZ



2025 ORIGINAL DOCUMENT IS 01/12/2021 0022222 008 0101

10/28/2020

USPS.com® - USPS Tracking® Results

USPS Tracking®

FAQs

Track Another Package +

Tracking Number: 70192280000189729476

Remove >

Your item was delivered at 12:48 pm on July 18, 2020 in ATLANTA, GA 30348.

✓ Delivered

July 18, 2020 at 12:48 pm

Delivered

ATLANTA, GA 30348

Get Updates ▾

7019 2280 0001 8972 9476

U.S. Post Service	
CERTIFIED MAIL RECEIPT	
Postage and Fees Only	
For delivery information, visit usps.com	
ATLANTA, GA 30374	
Certified Mail Fee	\$3.55
Extra Services & Fees (check box and fee amount)	\$0.00
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.55
Total Postage and Fees	\$4.10
Postmark	07/18/2020
City	ATLANTA
State	GA
Zip	30348

Can't fi

Go to our FAQs section to find answers to your tracking questions.

FAQs

LUBA GONZALEZ
7260 SUNNY COUNTRYSIDE AVE
LAS VEGAS NV 89179

EQUIFAX
PO BOX 740256
ATLANTA GA 30374

08.19.2020

Notice of Pending Litigation Seeking Relief and Monetary Damages Under FCRA
Section 616 & Section 617

Please accept this final written offer of settlement before litigation as my attempt to amicably resolve your continued violation of the Fair Credit Reporting Act regarding your refusal to delete all of the unverified account information from the consumer file.

Your failure to provide me with verifiable proof required to post the accounts listed below proves that it does not exist and is therefore unverified. I intend to pursue litigation in accordance with the FCRA to seek relief and recover all monetary damages that I may be entitled to under Section 616 and Section 617 if the unverified items listed below are not deleted within 10 days. A copy of this letter as well as copies of the three written letters sent to you previously will also become part of the formal complaint to the Federal Trade Commission and also shall be used as evidence in pending litigation provided you fail to comply with this offer of settlement.

Despite my three written requests, the unverified items listed below still remain on the credit report named, LUBA GONZALEZ, in violation of federal law. In the results of your investigations, you stated in writing that verified these items are being reported correctly; Who verified these accounts? How did they verify them? You still have not provided me with the name of the individual, business address, and telephone number of the person or business contacted during your re-investigation. You have not provided me a copy of any original documentation. Furthermore, you have failed to provide the method of verification as required under section 611(a)(7) Please be advised that under Section 511 (SNA) of the FCRA - you are required to promptly delete all information which cannot be verified.

The Law is very clear as to the Civil liability and the remedy available to me (Section 616 & 617) if you fail to comply with Federal Law. I am a litigious consumer and I fully intend on pursuing litigation in this matter to enforce my rights under the FCRA.

In order to avoid legal action, I demand that you send me copies of the documents you used to verify the following accounts listed below or you delete them immediately. Please provide me with a copy of an updated and corrected credit report showing that these items have been deleted.

Also I am instructing you to delete all non-account holding inquiries over thirty(30) days old.

Name of Account	Account Number	Provide physical proof of verification
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ALLTOP OF SOUTHERN

818 4656 11

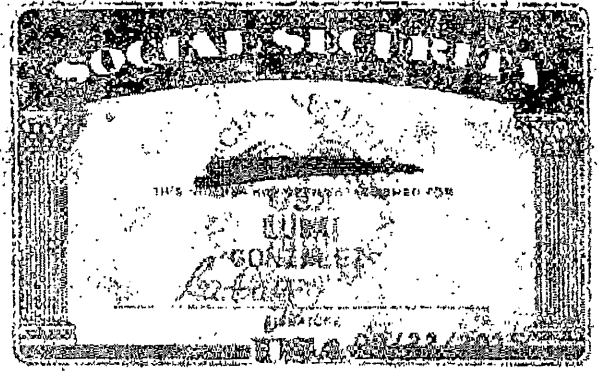
Unverified

<u>Name of Account</u>	<u>Account Number</u>	<u>Provide physical proof of verification</u>
- PORTFOLIO RECOVERY	SYNCH 1921006124	unverified
- COMM CREDIT CORP	55105 -	unverified
- COMENITY BANK/VIC	585637513633..	unverified
- AC WILLEY	215511...	unverified
- JPMCB	1137 ..	unverified
- SEQUIM ASSIST	... 928...	unverified
- CALVARY PORTFOLIO	... 698...	unverified
- JPMCB AUTO	1170391233	unverified
- JPMCB AUTO	1192 4718 50.	unverified

Thank You

~~XXXXXXXXXXXXXXXXXXXX~~
 SSN: ~~XXXXXXXXXX~~ ~~XXXXXX~~ ~~XXXXXX~~

[Signature]
 LUBA GONZALEZ



EFF ORIGINAL DOCUMENT 5 01/12/2021 00387432 008 0105

10/28/2020

USPS.com® - USPS Tracking® Results

USPS Tracking®

FAQs ;

Track Another Package +**Tracking Number: 70201290000197571582**

Remove >

Your item was delivered at 11:57 am on September 6, 2020 in ATLANTA, GA 30348.

✓ DeliveredSeptember 6, 2020 at 11:57 am
Delivered

ATLANTA, GA 30348

Get Updates ∨

USPS Certified Mail Receipt
Domestic Mail Only

Atlanta, GA 30374

Certified Mail Fee \$3.50

Extra Services & Fees (check box, add fee)

<input type="checkbox"/> Return Receipt (hardcopy)	\$2.80
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$3.00
<input type="checkbox"/> Adult Signature Required	\$3.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$6.00

Postage \$12.53

Postage and Fees \$16.03

Sent by *Expedita*

Returning Address (if not on box) *Box 740856*

City/State/Zip *Atlanta GA 30374*

Postmark Date *09/06/2020*

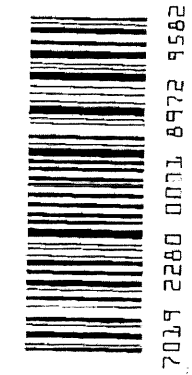
Postmark City *Atlanta*

Can't find

Go to our FAQs section to find answers to your tracking questions.

FAQs

EPX ORIGINAL DOCUMENT 5 01/12/2021 00387432 008 0107



Lisa Snow
7200 Sunny Canyon Side Ave
Las Vegas NV 89179



Equipart
1550 Peachtree St
Atlanta, GA 30309



7037 2220 0001 0572 9582

261864573

JUSTICE COURT, LAS VEGAS TOWNSHIP
Clark County Nevada

LUBA GONZALEZ, Plaintiff(s)
 vs.
 EQUIFAX LLC, Defendant(s)

CASE NO.: 20C019979

Department No.: 04

SUMMONS

FOR COURT USE ONLY

**NOTICE: YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD
 UNLESS YOU RESPOND WITHIN 20 DAYS.* READ THE INFORMATION BELOW.**

TO THE ABOVE-NAMED DEFENDANT: You are hereby summoned and required to serve upon Plaintiff's attorney, whose address is set forth below, an Answer to the Complaint which is herewith served upon you, within 20 days after service of this Summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.²

* If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day of service, you must do the following:

- File with the Clerk of the Court, whose address is shown below, a formal written response (Answer) to the Complaint in accordance with the rules of the Court. A \$71.00 filing fee is required, or you must file an Application to Proceed *In Forma Pauperis* and request a waiver of the fee. (You may obtain forms and information at the Civil Law Self-Help Center located in the Regional Justice Center or at its website at <http://www.civilawselfhelpcenter.org/>)
- Serve a copy of your response upon the attorney whose name and address is shown below.

- * Unless you respond, your default will be entered upon application of the Plaintiff, and this Court may enter a judgment against you for the relief demanded, which could result in the taking of money or property or other relief.
- * If you intend to seek the advice of an attorney, you should do so promptly so that your response will be timely.

GONZALEZ, LUBA
 7260 Sunny Countryside Ave Las Vegas NV
 89179
 Las Vegas, NV 89179

 Attorney Name, Address and Phone

By:

DEPUTY CLERK

Justice Court,
 Las Vegas Township
 Regional Justice Center
 200 Lewis Avenue
 PO Box 552511
 Las Vegas, NV 89155-2511

Jason Ortiz
 Deputy Clerk J. Ortiz



11/02/2020

Date

APPROPRIATE COURTROOM ATTIRE AND SHOES ARE REQUIRED. NO SHORTS, HALTER TOPS, TANK TOPS, FOOD OR DRINK ARE PERMITTED.

¹ Notwithstanding the above, the State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members, and legislators, each have 45 days after service of this Summons within which to file an Answer to the Complaint.

² When service of the Summons is made by publication, the Summons shall, in addition to any special statutory requirements, also contain a brief statement of the object of the action substantially as follows: "This action is brought to recover a judgment for the sum of (indicate dollar amount), due and owing," or as the case may be. (JCRCPL(b)).